

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO. 05-11807- RGS

EILEEN LAVALLEE,

Plaintiff

v.

TOWN OF SCITUATE and RICHARD
JOHNSON, Individually,

Defendants

JOINT SCHEDULING STATEMENT

Now come the parties and hereby submit the following Joint Statement pursuant to Local Rule 16.1(D):

1. NATURE OF ACTION

Plaintiff Eileen Lavallee asserts civil rights violations and common-law torts, based upon her allegation that defendant Richard Johnson, while a police officer for the Town of Scituate, committed an assault and battery and lewd and lascivious conduct against her. The defendant Richard Johnson denies all allegations of wrongdoing. The defendant Town of Scituate denies that it is liable for any allegedly wrongful conduct by Johnson.

2. PROPOSED PRE-TRIAL SCHEDULE

The parties propose the following discovery plan:

- a. Automatic Disclosures to be completed by March 15, 2006.
- b. All fact discovery to be completed by November 30, 2006.
- c. Plaintiff shall designate an expert witness, if any, and provide an expert report by December 30, 2006. Defendants shall designate expert witnesses, if any, and provide expert reports by January 30, 2007.
- d. All expert depositions shall be completed by February 28, 2007.
- e. Dispositive motions, if any, shall be served by March 31, 2007. Discovery motions, to the extent that they are necessary, will be filed prior to the close of discovery.

3. PRE-TRIAL CONFERENCE

A pre-trial conference will be scheduled by the Court.

4. LOCAL RULE 16.1(D)(3) CERTIFICATES

Local Rule 16.1(D)(3) Certificates will be filed separately.

DEFENDANT,

PLAINTIFF

TOWN OF SCITUATE,

EILEEN LAVALLEE,

By its attorneys,

By her attorney,

/s/Jackie Cowin

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DEFENDANT,

RICHARD JOHNSON,

By his attorney,

/s/John J. Cloherty, III /jc

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CERTIFICATE OF SERVICE

I, Jackie Cowin, certify that the above document will be served by first-class mail upon any party or counsel of record who is not a registered participant of the Court's ECF system, upon notification by the Court of those individuals who will not be served electronically. /s/Jackie Cowin